

EXHIBIT 229

Highly Confidential - Todd Cameron

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THE STATE OF MONTANA
OFFICE OF THE ATTORNEY GENERAL
OFFICE OF CONSUMER PROTECTION

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SEPTEMBER 26, 2018

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Oral testimony of TODD CAMERON, taken
pursuant to notice, was held at the law offices of
Baker & Hostetler, LLP, 250 South Civic Center Drive,
Suite 1200, Columbus, Ohio 43215, commencing at 10:23
a.m., on the above date, before Carol A. Kirk, a
Registered Merit Reporter.

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1 something that we consulted about over
2 the break. So this is a clarification
3 that's being made after Mr. Cameron had
4 a conversation with his counsel during
5 the break.

6 Okay. So, Todd --

7 THE WITNESS: Yes.

8 MS. WICHT: -- earlier this
9 morning we were talking about some
10 meetings -- three different meetings
11 that you've had with the DEA, remember?

12 THE WITNESS: Yes.

13 MS. WICHT: Okay. And the third
14 meeting in particular was one that
15 happened in 2018.

16 THE WITNESS: Yes.

17 MS. WICHT: And you had discussed
18 the fact that what you did at that
19 meeting was to present the program to
20 DEA and things of that nature, right?

21 THE WITNESS: Yes.

22 MS. WICHT: Okay. And I think
23 that Ms. Singer had asked a question
24 about whether there were -- what I wrote

1 down was something like a specific event
2 that had triggered the meeting.

3 THE WITNESS: Yes.

4 MS. WICHT: And I wanted to
5 clarify with you, for another person who
6 was participating in that meeting?

7 THE WITNESS: Yes.

8 MS. WICHT: Was there a specific
9 event that triggered the meeting?

10 THE WITNESS: Yes. So my
11 meeting -- my purpose of going to meet
12 with DEA was because previous leadership
13 had changed over. And the individuals
14 that were at the two previous meetings
15 were mostly gone from at least that
16 branch of the DEA.

17 So I had been instructed by my
18 boss to go and meet with the new
19 leadership and present the program to
20 them.

21 Linden came with me, because
22 Linden went to talk about suspicious
23 orders that we had identified internally
24 through our normal process that we had

1 (Montana-Cardinal Exhibit 21 marked.)

2 - - -

3 Q. So this is Bates number

4 CAH_MTAG_214.

5 A. Thank you.

6 Q. So this is a retired policy

7 related to national chain accounts, correct?

8 A. Correct.

9 Q. And there was a period of time
10 when Cardinal excluded chain accounts from its
11 Know Your Customer requirements; is that
12 accurate?

13 A. I know that there are components
14 of the KYC that are completed by the national
15 accounts team for national accounts.

16 Q. Okay. But not the full Know Your
17 Customer diligence process? You said components
18 that are --

19 A. From the KYC. So a lot of the
20 components when the customer comes on board to
21 fill out the information for national accounts,
22 that gets done by the national accounts team
23 because there's a corporate office that would be
24 involved in the completion in answering those

1 questions.

2 We still set the thresholds.

3 They're not involved in that process. But as
4 far as the documenting of the KYC for the
5 national accounts, that's done by that team.

6 Q. So my understanding is that
7 national chain accounts are treated differently
8 on the -- because of the assumption that they
9 have their own anti-diversion programs. Is that
10 accurate?

11 A. Treated differently in what way?

12 Q. They aren't subject to the same
13 kind of Know Your Customer onboarding as
14 independents.

15 A. That is true.

16 Q. And does Cardinal make any effort
17 to audit or check a chain pharmacy's
18 anti-diversion program?

19 A. The benefit to the national
20 accounts is we get corporate level --
21 corporate-provided store level data. And those
22 national accounts buy all of their controls from
23 us. So we actually have a better picture of the
24 national chains because they're not buying from